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July 14, 2015

**Via ECF**

Hon. Colleen McMahon  
United States District Court  
500 Pearl Street, Room 1640  
New York, N.Y. 10007

Re: *Consolidated Edison Company of New York, Inc. v. Lexington Insurance Company*,  
Case No. 14-cv-06547-CM  
Our File No.: 02331-007950

Dear Judge McMahon:

We represent defendant Lexington Insurance Company.

The purpose of this letter is to request a 14-day extension of the July 21, 2015 deadline to submit a joint pre-trial order. This request is made jointly by Lexington and plaintiff Consolidated Edison.

Our client is out of the office for part of this week. In addition, Lexington's trial lawyer, Lawrence Klein, is in trial all of this week in California. The parties agree that they will mutually benefit from the additional time to prepare the joint pre-trial order.

The deadline was extended once before. On June 1, 2015, it was reset to July 21, 2015, as the depositions in the case had not yet been completed as of that time (Doc. # 48). The depositions have since been completed. A motion for partial summary judgment by Lexington is pending.

Accordingly, the parties jointly request that the deadline to submit the pretrial order be extended from July 21, 2015 to August 4, 2015.

Thank for Your Honor's consideration of this request.

Respectfully,

A handwritten signature in black ink that reads "Tim Kevane".

Timothy D. Kevane  
Sedgwick LLP

A handwritten signature in black ink that reads "David L. Elkind".

David L. Elkind  
Lowenstein Sandler LLP

cc: Lawrence Klein